UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

July 23, 2002

**MEMORANDUM**

SUBJECT: **Chlorpropham (CIPC)** [018301], Outcome of 7/17/02 ChemSAC Meeting Regarding RTU Product Labels, D284525.

From: Danette Drew, Chemist
Reregistration Branch 3
Health Effects Division [7509C]

Through: Catherine Eiden, Branch Senior Scientist
Reregistration Branch 3
Health Effects Division [7509C]

To: Gary Mullins, Chemical Review Manager
Reregistration Branch 3
Special Review and Reregistration Division [7508C]

In a memorandum dated April 8, 2002 (D282018; D. Drew), HED determined that while CIPC RTU (ready-to-use) formulation product label rates do not exceed the maximum *single* application rates used in the residue studies on potatoes, the labels do not clearly state the maximum *seasonal* application rate and do not specify a maximum number of allowable applications. Additionally, a minimum retreatment interval, as used in the residue studies, is not specified. This was cited as a deficiency and label amendment recommendations were made.

Subsequently, the issue of appropriate label amendments for these products was brought to the HED Chemistry Science Advisory Council (ChemSAC) for consideration (7/17/02 ChemSAC Meeting). It was determined that the current labels for these products do not need to be amended to specify a number of applications or a retreatment interval but *do need to be amended to include language that clearly specifies a maximum seasonal rate* (i.e. maximum seasonal rate not to exceed 0.028 lb ai/1000 lb potatoes for labels indicating use up to 165% of the "standard"(0.017 lb ai/1000 lbs of potatoes) rate. In the case of labels indicating 145% of the "standard" rate, the total seasonal rate should not exceed 0.025 lbs ai/1000 lbs of potatoes).

The following rates represent the maximum application rates, as well as the minimum retreatment intervals, used in the magnitude of the residue (Guideline 860.1500) studies that support the reassessed CIPC tolerance of 30 ppm:

> *aerosol fog at 0.022 lb ai/1000 lbs potato in each of two applications 90 days apart (0.044 lb ai total aerosol) followed by direct spray at 0.0104 lb ai/1000 lbs potato (0.054 lb ai total appplied);*
>
> *aerosol fog at 0.033 lb ai/1000 lbs potato and a second aerosol fog 140 days later at 0.017 lb ai/1000 lb potato (0.05 lb ai total aerosol).*

The ChemSAC decision, which applies only to the currently registered CIPC RTU product labels, was based on the fact that the highest single application rates (0.022 or 0.033 lb ai/1000 lb potatoes) used in the residue studies approximate the maximum *total* rate indicated by the sliding scale on the labels (0.025 lb ai and 0.028 lb ai; see Attachment 1).

Any single application to stored potatoes, when applied as described in the current labels, would not exceed the highest single rate used in the residue studies (0.033 lb ai). Total application to potatoes, when applied according to the labels, would also not exceed the highest single rate used in the residue studies (0.033 lb ai). So regardless of number of applications, or intervals between applications, residues would be expected to be below the tolerance (30 ppm) as long as the maximum seasonal label rate of 0.028 lb ai/1000 lb potatoes is not exceeded. Therefore, no label amendments are required at this time with regard to number of applications or retreatment interval. RTU labels should be amended, however, to clearly specify a maximum seasonal use of 0.028 lb ai/ 1000 lb potatoes (or 0.025 l lb ai/ 1000 lb potatoes where appropriate).

It should be noted that the CIPC EC product labels should also be amended to clearly state a maximum seasonal rate of 0.0104 lb ai/ 1000 lb potatoes.

cc: D. Drew, RF, Gary Mullins (SRRD),Anne Overstreet (SRRD)
RDI: C. Eiden 7/25/02

Attachment 1

Recommended label rates of CIPC RTU application:

| TIME MONTHS | Storage Temperature | | | | |
|---|---|---|---|---|---|
| | 40°F | 45°F | 50°F | 55°F | 60°F |
| 1 | 80% | 90% | 100% | 110% | 120% |
| 2 | 85% | 95% | 105% | 115% | 125% |
| 3 | 90% | 100% | 110% | 120% | 130% |
| 4 | 95% | 105% | 115% | 125% | 135% |
| 5 | 100% | 110% | 120% | 130% | 140% |
| 6 | 105% | 115% | 125% | 135% | 145% |
| 7 | 110% | 120% | 130% | 140% | 150% |
| 8 | 115% | 125% | 135% | 145% | 155% |
| 9 | 120% | 130% | 140% | 150% | 160% |
| 10 | 125% | 135% | 145% | 155% | 165% |

Initial treatment depends on anticipated length of storage and storage temperature. According to label directions, the “standard” application rate, or 100% treatment, is 0.017 lb/1000 lb potato (i.e. 1 lb ai/600 cwt). Any retreatment must take into account previous treatment levels. The implied maximum rate is 165% of the standard rate, calculated to be 0.028 lb/1000 lb potato when standard rate is 0.017 lb/1000 lb potato (or 145% of standard rate, calculated to be 0.025 lb/1000 lb potato).